

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: EAM 40 MEADOW LANE LLC, Debtor.	Case No. 22-10293 (BLS) Chapter 7
In re: EZL 40 MEADOW LANE LLC, Debtor.	Case No. 22-10294 (BLS) Chapter 7
GEORGE L. MILLER, Chapter 7 Trustee for the bankruptcy estates of EAM 40 Meadow Lane LLC and EZL 40 Meadow Lane LLC, Plaintiff,	
DEFENDANTS	ADV. NO.¹
Ahmad Yousf Kamal	24-50024
Anthony B. Tufariello and Kathleen Tufariello	24-50025
Eric Tanjeloff	24-50027
Jordan Vogel	24-50029
Nino Cohen	24-50031
Quinn Emanuel Urquhart & Sullivan LLP	24-50032
Ermitage One LLC and Ranee A. Bartolacci	24-50034
Davidoff, Hutcher & Citron LLP	24-50035
MCAM 40ML Lender LLC; Monroe Capital Management Advisors LLC and MC Asset Management (Corporate), LLC	24-50036
Harsh Padia	24-50037
Harsh Padia	24-50038 ²

STATUS REPORT IN ADVERSARY PROCEEDINGS

George L. Miller, chapter 7 trustee (the “Trustee”) for the bankruptcy estates of EAM 40 Meadow Lane LLC and EZL 40 Meadow Lane LLC (collectively, the “Estates”), by his undersigned counsel, hereby files a Status Report in connection with the above-captioned adversary proceedings (collectively, the “Adversary Proceedings”).

¹ Except as otherwise indicated, all adversary proceedings are pending in connection with the EAM 40 Meadow Lane LLC bankruptcy case.

² Adversary No. 24-50038 is pending in connection with the EZL 40 Meadow Lane LLC bankruptcy case.

Date: April 15, 2025
Wilmington, DE

COZEN O'CONNOR

By: /s/ Simon E. Fraser

John T. Carroll, III (DE No. 4060)
Simon E. Fraser (DE No. 5335)
1201 North Market Street
Suite 1001
Wilmington, DE 19801
(302) 295-2000 Telephone
(302) 295-2013 Fax No.
Email: jcarroll@cozen.com
Email: sfraser@cozen.com

and

Christina M. Sanfelippo
(*Pro Hac Vice forthcoming*)
123 North Wacker Drive
Suite 1800
Chicago, IL 60606
(312) 382-3100 Telephone
Email: csanfelippo@cozen.com

*Counsel for George L. Miller,
Chapter 7 Trustee*

STATUS “A”**CONTESTED ADVERSARY PROCEEDINGS WHERE SERVICE
HAS NOT BEEN COMPLETED**

Defendant’s Name	Adversary Number	Status
-------------------------	-----------------------------	---------------

Ahmad Yousf Kamal	24-50024	Foreign defendant to be served via Hague Convention
-------------------	----------	--

STATUS “B”**CONTESTED ADVERSARY PROCEEDINGS WHERE SERVICE
IS COMPLETE, BUT ANSWERS ARE STILL DUE**

Defendant’s Name	Adversary Number	Status
-------------------------	-----------------------------	---------------

See Status “I”

STATUS “C”**CONTESTED ADVERSARY PROCEEDINGS WHERE SERVICE IS
COMPLETED, NO ANSWERS HAVE BEEN FILED. THUS, PLAINTIFF
REQUESTING DEFAULT JUDGMENTS**

Defendant’s Name	Adversary Number	Status
-------------------------	-----------------------------	---------------

Anthony B. Tufariello and Kathleen Tufariello	24-50025	Upon information the Trustee believes Defendant, Kathleen Tufariello is deceased.
--	----------	---

Default entered against Defendant,
Anthony B. Tufariello [D.I. 13]. Clerk
incorrectly denied the Trustee’s request
for default judgment against Defendant
Anthony B. Tufariello [D.I. 14].³

³ The Clerk of Court denied the Trustee’s request for default judgment on the basis that the amounts for each defendant were not specified in the Complaint [D.I. 14]. However, the Complaint seeks the sum certain amount of \$200,000.00, which represents the amount of the subsequent transfers made to both defendants, plus court costs of \$350.00. [See D.I. 1, 12].

STATUS “D”**ADVERSARY PROCEEDINGS SETTLED, SETTLEMENT AGREEMENT
EXECUTED AND/OR FILED AND PLAINTIFF REQUESTING DISMISSAL OF
ADVERSARY PROCEEDINGS**

Defendant’s Name	Adversary Number	Status
MCAM 40ML Lender LLC; Monroe Capital Management Advisors LLC and MC Asset Management (Corporate), LLC	24-50036	Order Approving Settlement of Avoidance Action entered on 3/10/2025 [D.I. 22]. Adversary proceeding can be closed.

STATUS “E”**ADVERSARY PROCEEDINGS RESOLVED/SETTLED, BUT
NOTICES/STIPULATIONS OF DISMISSAL CANNOT YET BE FILED**

Defendant’s Name	Adversary Number	Status
-------------------------	-----------------------------	---------------

None

STATUS “F”**CONTESTED ADVERSARY PROCEEDINGS WHERE SERVICE
IS COMPLETE, ANSWERS HAVE BEEN FILED,
AND DISCOVERY/DISCLOSURES ARE ONGOING**

Defendant’s Name	Adversary Number	Status
Jordan Vogel	24-50029	Parties are exchanging discovery
Davidoff, Hutcher & Citron LLP	24-50035	Parties are exchanging discovery
Harsh Padia (EAM)	24-50037	Parties are exchanging discovery
Harsh Padia (EZL)	24-50038	Parties are exchanging discovery

STATUS “G”**CONTESTED ADVERSARY PROCEEDINGS WHERE NOTICES
OF SELECTION OF MEDIATOR HAVE BEEN FILED**

Defendant’s Name	Adversary Number	Status
Jordan Vogel	24-50029	Mediator, Ian Connor Bifferato
Davidoff, Hutcher & Citron LLP	24-50035	Mediator, Anthony M. Saccullo
Harsh Padia	24-50037	Mediator, Lucian B. Murley
Harsh Padia	24-50038	Mediator, Lucian B. Murley

STATUS “H”**CONTESTED ADVERSARY PROCEEDINGS READY FOR TRIAL**

Defendant’s Name	Adversary Number	Status
-------------------------	-----------------------------	---------------

None

STATUS “I”**CONTESTED ADVERSARY PROCEEDINGS WHERE
DISPOSITIVE MOTIONS PENDING**

Defendant’s Name	Adversary Number	Status
Eric Tanjeloff	24-50027	Defendant’s Motion to Dismiss Complaint [D.I. 11]; Notice of Completion of Briefing [D.I. 20]
Nino Cohen	24-50031	Defendant’s Motion to Dismiss Complaint [D.I. 6]; Notice of Completion of Briefing [D.I. 23]
Quinn Emanuel Urquhart & Sullivan LLP	24-50032	Defendant’s Motion for Judgment on the Pleadings [D.I. 18]; Notice of Completion of Briefing [D.I. 27]

STATUS "J"**CONTESTED ADVERSARY PROCEEDINGS WHICH ARE
STAYED BY THE FILING OF ANOTHER BANKRUPTCY ACTION
AFFECTING A PARTY IN THIS MATTER**

Defendant's Name	Adversary Number	Status
Ermitage One LLC and Ranee A. Bartolacci	24-50034	Default and Default Judgment entered against Defendant, Ermitage One LLC. Defendant, Ranee A. Bartolacci has filed a chapter 7 bankruptcy case in the U.S. Bankruptcy Court for the Southern District of Florida, Case No. 24-18942 (" <u>FL Bankruptcy</u> "). Trustee has initiated an adversary proceeding against Bartolacci in the FL Bankruptcy to seek a determination of dischargeability of the debt owed to the EAM 40 Meadow Lane LLC bankruptcy estate, Adv. No. 24-01485.

STATUS "K"**LIST ALL ADVERSARY PROCEEDINGS WHICH AN APPEAL IS PENDING**

Defendant's Name	Adversary Number	Status
-------------------------	-----------------------------	---------------

None